

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

MOHAMMAD M. HUSSAIN,

*

Plaintiff,

*

v.

*

Civil Action No.: 1:12cv 662
CMH/TRJ

COSTCO WHOLESALE CORPORATION,

*

Defendant.

*

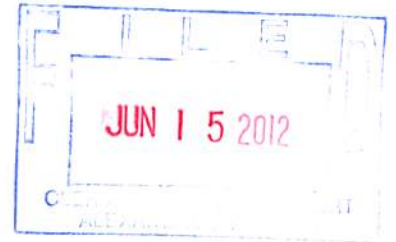
ANSWER

COMES NOW the defendant, Costco Wholesale Corporation, (hereinafter "Costco"), by counsel, and states as follows for its Answer to the plaintiffs' Complaint:

1. Costco admits the allegations contained in Paragraph 1 of the Complaint.
2. Costco admits the allegations contained in Paragraph 2 of the Complaint.
3. Costco admits the allegations contained in Paragraph 3 of the Complaint.
4. Costco admits the allegations contained in Paragraph 4 of the Complaint.
5. Costco admits the allegations contained in Paragraph 5 of the Complaint.
6. Costco has insufficient information to admit or deny the allegations contained in

Paragraph 6 of the Complaint.

7. Costco denies the allegations contained in Paragraph 7 of the Complaint.
8. Costco denies the allegations contained in Paragraph 8 of the Complaint.
9. Costco denies the allegations contained in Paragraph 9 of the Complaint.
10. Costco denies the allegations contained in Paragraph 10 of the Complaint.
11. Costco denies the allegations contained in Paragraph 11 of the Complaint.
12. Costco denies the allegations contained in Paragraph 12 of the Complaint.



13. Costco denies the allegations contained in Paragraph 13 of the Complaint.
14. Costco denies the allegations contained in Paragraph 14 of the Complaint.
15. Costco denies the allegations contained in Paragraph 15 of the Complaint.
16. Costco denies the allegations contained in Paragraph 16 of the Complaint.
17. Costco denies the allegations contained in Paragraph 17 of the Complaint.
18. Costco denies the allegations contained in Paragraph 18 of the Complaint.
19. Costco objects to Plaintiff's attempted reservation of right contained in Paragraph 19 of the Complaint. To the extent that a response is required, Costco denies the allegations contained in Paragraph 19 of the Complaint.

AFFIRMATIVE DEFENSES

20. Costco incorporates by reference its responses to the preceding paragraphs of plaintiffs' Complaint.
21. Costco denies any allegations in the Complaint not specifically admitted herein.
22. Costco alleges that Plaintiff was guilty of contributory negligence that was a proximate cause of the accident and any injuries.
23. Costco alleges that Plaintiff assumed the risk of the accident and her injuries.
24. Costco alleges that Plaintiff failed to mitigate his damages.
25. Costco alleges that any alleged defective condition in the premises was open and obvious.
26. Costco alleges that Plaintiff's accident and any injuries were caused by the actions of another or others over whom Costco had no control.
27. Costco denies that it is indebted to the plaintiffs in any manner or for any amount.

28. Costco reserves the right to assert at trial any and all properly provable defenses it may have to this action and, further, reserves the right to amend its Answer accordingly if it be so advised.

WHEREFORE, Costco Wholesale Corporation, by counsel, denies that it is liable to the Plaintiff in any amount whatsoever and moves that this action be dismissed and the Plaintiff ordered to pay all costs incurred.

Respectfully submitted,

COSTCO WHOLESALE CORPORATION,

By: 

Counsel

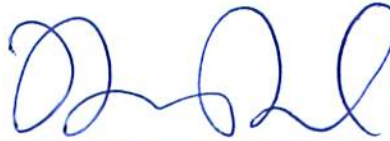
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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of June, 2012, a copy of the foregoing Answer was sent by mail to the following:

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